UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEVIN P. FITZPATRICK, et al.,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP, INC. and AIG GLOBAL REAL ESTATE INVESTMENT CORPORATION,

Defendants.

No. 1:10-cv-142 (MHD)

NOTICE OF
MOTION TO SEAL

PLEASE TAKE NOTICE that the defendants American International Group, Inc. and AIG Global Real Estate Investment Corporation, by their attorneys DLA Piper LLP (US), upon the accompanying memorandum of law, hereby move this Court for entry of an Order sealing Exhibits 5, 6, 10, 11, 14, and 18 attached to the plaintiffs' January 21, 2011 letter to the Court.

Dated: January 28, 2011
New York, New York

/s/ Keara M. Gordon

Charles P. Scheeler (*admitted pro hac vice*)
Keara M. Gordon (KG 2323)
Stephanie K. Vogel (SV 8591)
DLA PIPER LLP (US)
1251 Avenue of the Americas
New York, New York 10020
Tel: (212) 335-4500
Fax: (212) 335-4501

Attorneys for Defendants American International Group, Inc. and AIG Global Real Estate Investment Corporation

To: Michael E. Petrella
O'Shea Partners LLP
521 Fifth Avenue, 25th Floor
New York, New York 10175

Attorneys for Plaintiffs